

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

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BHUPINDER SINGH

Plaintiff,  
v.  
Case: 3:23cv339

HARMANPREET SINGH,  
and

KULBIR KAUR,  
and

ARMAAN VA CORP. d/b/a LOVELY MARKET,

Defendants.

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**DEFENDANT HARMANPREET SINGH'S ANSWER TO PLAINTIFF'S COMPLAINT**

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COMES NOW, your Defendant, Harmanpreet Singh (hereinafter "H. Singh", by Counsel, Scott D. Cardani, Esquire and Jacqueline W. Critzer, Esquire and answers Plaintiff's Complaint as follows.

1. The Defendant H. Singh denies the allegations in paragraph 1 of Plaintiff's Complaint.
2. The Defendant H. Singh denies the allegations in paragraph 2 of Plaintiff's Complaint.
3. The Defendant H. Singh denies the allegations in paragraph 3 of Plaintiff's Complaint.
4. The Defendant H. Singh denies the allegations in paragraph 4 of Plaintiff's Complaint.
5. The Defendant H. Singh lacks sufficient knowledge to admit or deny the allegations in paragraph 5 of Plaintiff's Complaint.

6. The Defendant H. Singh admits in part and denies in part paragraph 6 of Plaintiff's Complaint. Defendant H. Singh asserts the company has lost its lease and is not currently operating to his understanding.

7. The Defendant H. Singh denies the allegations in paragraph 7 of Plaintiff's Complaint.

8. The Defendant H. Singh denies the allegations in paragraph 8 of Plaintiff's Complaint.

9. The Defendant H. Singh admits in part and denies in part to Paragraph 9 of the Plaintiff's Complaint. Defendant H. Singh admits to proper venue and denies events or omissions giving rise to a lawsuit.

10. The Defendant H. Singh admits the allegations in paragraph 10 of Plaintiff's Complaint.

11. The Defendant H. Singh denies the allegations in paragraph 11 of Plaintiff's Complaint.

12. The Defendant H. Singh lacks sufficient knowledge to admit or deny the allegations in paragraph 12 of Plaintiff's Complaint.

13. The Defendant H. Singh lacks sufficient knowledge to admit or deny the allegations in paragraph 13 of Plaintiff's Complaint.

14. The Defendant H. Singh denies the allegations in paragraph 14 of Plaintiff's Complaint.

15. The Defendant H. Singh denies the allegations in paragraph 15 of Plaintiff's Complaint.

16. The Defendant H. Singh denies the allegations in paragraph 16 of Plaintiff's Complaint.

17. The Defendant H. Singh denies the allegations in paragraph 17 of Plaintiff's Complaint.

18. The Defendant H. Singh denies the allegations in paragraph 18 of Plaintiff's Complaint.

19. The Defendant H. Singh denies the allegations in paragraph 19 of Plaintiff's Complaint.

20. The Defendant H. Singh denies the allegations in paragraph 20 of Plaintiff's Complaint.

21. The Defendant H. Singh denies the allegations in paragraph 21 of Plaintiff's Complaint.

22. The Defendant H. Singh denies the allegations in paragraph 22 of Plaintiff's Complaint.

23. The Defendant H. Singh denies the allegations in paragraph 23 of Plaintiff's Complaint.
24. The Defendant H. Singh lacks sufficient knowledge to admit or deny the allegations in paragraph 24 of Plaintiff's Complaint.
25. The Defendant H. Singh denies the allegations in paragraph 25 of Plaintiff's Complaint.
26. The Defendant H. Singh denies the allegations in paragraph 26 of Plaintiff's Complaint.
27. The Defendant H. Singh denies the allegations in paragraph 27 of Plaintiff's Complaint.
28. The Defendant H. Singh denies the allegations in paragraph 28 of Plaintiff's Complaint.
29. The Defendant H. Singh denies the allegations in paragraph 29 of Plaintiff's Complaint.
30. The Defendant H. Singh denies the allegations in paragraph 30 of Plaintiff's Complaint.
31. The Defendant H. Singh denies the allegations in paragraph 31 of Plaintiff's Complaint.
32. The Defendant H. Singh denies the allegations in paragraph 32 of Plaintiff's Complaint.
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42. The Defendant H. Singh denies the allegations in paragraph 42 of Plaintiff's Complaint.
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44. The Defendant H. Singh denies the allegations in paragraph 44 of Plaintiff's Complaint.

45. The Defendant H. Singh denies the allegations in paragraph 45 of Plaintiff's Complaint.
46. The Defendant H. Singh denies the allegations in paragraph 46 of Plaintiff's Complaint.
47. The Defendant H. Singh denies the allegations in paragraph 47 of Plaintiff's Complaint.
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107. The Defendant H. Singh denies the allegations in paragraph 107 of Plaintiff's Complaint.
108. The Defendant H. Singh denies the allegations in paragraph 108 of Plaintiff's Complaint.
109. The Defendant H. Singh denies the allegations in paragraph 109 of Plaintiff's Complaint.
110. The Defendant H. Singh denies the allegations in paragraph 110 of Plaintiff's Complaint.
111. The Defendant H. Singh admits the allegations in paragraph 111 of Plaintiff's Complaint.
112. The Defendant H. Singh admits the allegations in paragraph 112 of Plaintiff's Complaint.
113. The Defendant H. Singh admits the allegations in paragraph 113 of Plaintiff's Complaint.

114. The Defendant H. Singh denies the allegations in paragraph 114 of Plaintiff's Complaint.
115. The Defendant H. Singh denies the allegations in paragraph 115 of Plaintiff's Complaint.
116. The Defendant H. Singh denies the allegations in paragraph 116 of Plaintiff's Complaint.
117. The Defendant H. Singh denies the allegations in paragraph 117 of Plaintiff's Complaint.
118. The Defendant H. Singh denies the allegations in paragraph 118 of Plaintiff's Complaint.
119. The Defendant H. Singh denies the allegations in paragraph 119 of Plaintiff's Complaint.
120. The Defendant H. Singh lacks sufficient knowledge to admit or deny the allegations in paragraph 120 of Plaintiff's Complaint.
121. The Defendant H. Singh denies the allegations in paragraph 121 of Plaintiff's Complaint.
122. The Defendant H. Singh denies the allegations in paragraph 122 of Plaintiff's Complaint.
123. The Defendant H. Singh denies the allegations in paragraph 123 of Plaintiff's Complaint.
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134. The Defendant H. Singh denies the allegations in paragraph 134 of Plaintiff's Complaint.
135. The Defendant H. Singh denies the allegations in paragraph 135 of Plaintiff's Complaint.

136. The Defendant H. Singh denies the allegations in paragraph 136 of Plaintiff's Complaint.

137. The Defendant H. Singh lacks sufficient knowledge to admit or deny the allegations in paragraph 137 of Plaintiff's Complaint.

138. The Defendant H. Singh lacks sufficient knowledge to admit for deny the allegations in paragraph 138 of Plaintiff's Complaint.

139. The Defendant H. Singh denies the allegations in paragraph 139 of Plaintiff's Complaint.

140. The Defendant H. Singh denies the allegations in paragraph 140 of Plaintiff's Complaint.

141. The Defendant H. Singh lacks sufficient knowledge to admit for deny the allegations in paragraph 141 of Plaintiff's Complaint.

142. The Defendant H. Singh denies the allegations in paragraph 142 of Plaintiff's Complaint.

143. The Defendant H. Singh denies the allegations in paragraph 143 of Plaintiff's Complaint.

144. The Defendant H. Singh denies the allegations in paragraph 144 of Plaintiff's Complaint.

145. The Defendant H. Singh denies the allegations in paragraph 145 of Plaintiff's Complaint.

146. The Defendant H. Singh denies the allegations in paragraph 146 of Plaintiff's Complaint.

147. The Defendant H. Singh denies the allegations in paragraph 147 of Plaintiff's Complaint.

148. The Defendant H. Singh lacks sufficient knowledge to admit for deny the allegations in paragraph 148 of Plaintiff's Complaint.

149. The Defendant H. Singh denies the allegations in paragraph 149 of Plaintiff's Complaint.

150. The Defendant H. Singh denies the allegations in paragraph 150 of Plaintiff's Complaint.

151. The Defendant H. Singh denies the allegations in paragraph 151 of Plaintiff's Complaint.

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166. The Defendant H. Singh admits the allegations in paragraph 166 of Plaintiff's Complaint.
167. The Defendant H. Singh denies the allegations in paragraph 167 of Plaintiff's Complaint.
168. The Defendant H. Singh denies the allegations in paragraph 168 of Plaintiff's Complaint.
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172. The Defendant H. Singh denies the allegations in paragraph 172 of Plaintiff's Complaint.
173. The Defendant H. Singh denies the allegations in paragraph 173 of Plaintiff's Complaint.
174. The Defendant H. Singh denies the allegations in paragraph 174 of Plaintiff's Complaint.
175. The Defendant H. Singh denies the allegations in paragraph 175 of Plaintiff's Complaint.

**RELIEF REQUESTED**

**WHEREFORE**, the Defendant H. Singh prays that the Complaint against him be dismissed and for any further relief the Court deems his cause may require.

Respectfully Submitted:

Jacqueline W. Critzer, Esquire and  
Scott D. Cardani, Esquire

By: /s/ Jacqueline W. Critzer, Esq.  
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**CERTIFICATION OF SERVICE**

I hereby certify that on July 31, 2024, I mailed the foregoing Answer by electronic mail or first class mail, postage pre-paid to Craig Juraj Curwood, Esquire ([craig@butlercurwood.com](mailto:craig@butlercurwood.com)) and Samantha R Galina, Esquire ([samantha@butlercurwood.com](mailto:samantha@butlercurwood.com)) at Butler Curwood, PLC 140 Virginia Street, Suite 302 Richond, Virginia 23219.

/s/ Jacqueline W. Critzer, Esq.  
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